UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

YJIP, INC.	§	
	§	
Plaintiff,	§	**Civil Action No.: 16-cv-3397**
	§	
v.	§	
	§	
SKYWALKER HOLDINGS, LLC	§	
	§	
Defendant.	§	

COMPLAINT REGARDING PATENT INFRINGEMENT

YJIP, Inc. (hereinafter "Plaintiff'), for its Complaint for Patent Infringement against Skywalker Holdings, LLC, ("Defendants") states and alleges as follows:

1. Plaintiff YJIP, Inc. is a corporation organized and existing under the laws of the State of Texas, having a principal address of 3970 Lindbergh Drive, Addison, Texas 75001, and is the owner of United States Design Patent No. D555,222 entitled "Structural Member for a Safety Enclosure for a Recreational Structure," ("the '222 Patent").

2. Upon information and belief, Skywalker Holdings, LLC is a corporation organized and existing under the laws of the State of Utah, having a place of business at 1006 Promontory Rd., #8, Brigham City, Utah 84302, and has committed acts of infringement in this judicial district and is subject to personal jurisdiction in this judicial district.

COUNT I - PATENT INFRINGEMENT

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 United States Code, §271 *et seq.*

4. Jurisdiction of the subject matter of this action is established under 28 U.S.C. §§1331 and 1338. Venue is determined by 28 U.S.C. §§1391 and 1400.

5. On information and belief, Skywalker Holdings, LLC has willfully and knowingly made, used, sold and/or offered for sale and continues to make, use, sell and/or offer for sale devices embodying the patented inventions that constitute infringement of U.S. Patent No. D555,222 in violation of 35 U.S.C. §271, *et seq.* and will continue to do so unless enjoined by this court.

6. Plaintiff seeks an injunction and damages for Defendant's infringement no less than a reasonable royalty.

PRAYER FOR RELIEF

WHEREFORE, plaintiff prays that:

WHEREFORE, Plaintiff prays for:

A. A preliminary and permanent injunction enjoining Defendant, its officers, directors, agents, and employees from further acts of infringement of U.S. Patent No. D555,222;

B. An award of damages for infringement;

C. An increase in the sums awarded to three times the actual damages pursuant to 35 U.S.C. §284;

D. An award of attorney fees in this action pursuant to 35 U.S.C. §285;

E. An award of interest and costs of suit; and

F. Such other relief as the Court deems proper and just.

PLAINTIFF'S JURY DEMAND

Plaintiff demands a trial by jury on all issues that may be so tried.

/s Robert M. Mason
Robert M. Mason

Dated: December 8, 2016

Respectfully submitted,

/s Robert M. Mason
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